

1 Plaintiff, Francisca Moralez ("Plaintiff"), and Defendants, California Check Cashing
2 Stores, LLC dba California Check Cashing; and Genirberg Family, LLC, dba The Genirberg
3 Family Limited Partnership ("Defendants," and together with Plaintiff, "the Parties"), by and
4 through their respective counsel, hereby stipulate as follows:

5 1. This action arises out of Plaintiff's claims that Defendants denied her full and
6 equal access to their public accommodation on account of her disabilities in violation of Title
7 III of the Americans with Disabilities Act ("ADA") and parallel California law. Plaintiff seeks
8 injunctive relief under federal and California law, as well as damages under California law.
9 This matter therefore proceeds under this district's General Order 56 which governs ADA
10 access matters.

11 2. The Court has ordered that the Parties conduct a joint site inspection of the
12 subject property on or before February 8, 2018 (Dkt. 4); thereafter, the Parties requested an
13 extension and were given until February 13, 2018 (Dkt. 19).

14 3. The Parties are engaging in settlement discussions and wish to avoid incurring
15 additional attorney's fees and costs incident to attending the joint site inspection while
16 settlement efforts are being exhausted. The Parties appear to be near settlement.

17 4. The Parties have agreed to conduct the joint site inspection on March 2, 2018 at
18 10:30 a.m. unless a settlement is reached prior to that date.

19 5. Accordingly, the Parties stipulate to extend the deadline to conduct the joint site
20 inspection to March 2, 2018.

21 **IT IS SO STIPULATED.**

22
23 Dated: February 12, 2018

MISSION LAW FIRM, A.P.C.

24
25 /s/ Zachary M. Best

26 Zachary M. Best
27 Attorney for Plaintiff,
28 Francisca Moralez

SECOND STIPULATION TO EXTEND DEADLINE TO COMPLETE JOINT SITE INSPECTION
REQUIRED BY GENERAL ORDER 56; ~~PROPOSED~~ ORDER

1 Dated: February 12, 2018

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P .C.

2
3 /s/ Anthony J. Decristoforo

Anthony J. Decristoforo
Attorneys for Defendant,
California Check Cashing Stores, LLC
dba California Check Cashing

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5
6
7 Dated: February 12, 2018

FERBER LAW

8 /s/ James B. Wickersham

James B. Wickersham
Attorneys for Defendant,
Genirberg Family, LLC, dba The Genirberg
Family Limited Partnership

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10
11 **ATTESTATION**

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13 Concurrence in the filing of this document has been obtained from each of the individual(s)
14 whose electronic signature is attributed above.

15 /s/ Zachary M. Best

Zachary M. Best
Attorney for Plaintiff,
Francisca Moralez

16
17
18 **~~PROPOSED~~ ORDER**

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20 The Parties having so stipulated and good cause appearing,

21 **IT IS HEREBY ORDERED** that the deadline for the Parties to complete the joint site
22 inspection is extended to March 2, 2018, with all dates triggered by that deadline continued
23 accordingly.

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25 **IT IS SO ORDERED.**

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27 Dated: February 14, 2018


United States District Judge

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SECOND STIPULATION TO EXTEND DEADLINE TO COMPLETE JOINT SITE INSPECTION
REQUIRED BY GENERAL ORDER 56; ~~PROPOSED~~ ORDER